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November 23, 1998

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Magalie Roman Salas Secretary Federal Communications Commission 1919 M Street, NW Washington, D.C. 20554

RE: Comments for CC Docket No. 98-184

Dear Ms. Salas:



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National Small Business United (NSBU) welcomes the opportunity to express our support for the proposed merger of Bell Atlantic Corporation and GTE Corporation. We believe that this merger will only encourage, not restrict, vigorous competition in the small business markets for local, long distance, internet and wireless services. Since small businesses are not the beneficiaries of either the subsidized service seen in the residential markets or the volume discounts enjoyed by large businesses, this sort of aggressive competition is the only dependable way to provide the sort of value and service that small businesses need.

National Small Business United is the nation's oldest national small business association. Founded in 1937, the association currently represents 65,000 small businesses in all fifty states. Our main objective is to advocate forcefully for the needs of small businesses, on a bi-partisan basis, at the national level.

Small businesses share many of the same concerns other consumers have regarding the need for affordable and reliable telecommunications services. We are encouraged by the commitments Bell Atlantic and GTE have demonstrated in their Public Interest Statement to jump-start competition in all segments of the telecommunications industry.

We believe the national small business community will see substantial benefits if the Commission moves forward expeditiously to approve this merger. Only through the expanded resources of the new company will it be able to provide new and direct competition on a national scale. Small businesses will benefit from this competition through the resulting competitive prices and new and expanded services provided. Our members will also benefit from the ability to use their hard-earned dollars more effectively in the purchase of these services. Small businesses will be empowered through a variety of choices that are not available to them today. The Commission must consider the following benefits to all telecommunications consumers, including small businesses, when approving this merger:

• LOCAL SERVICES. Bell Atlantic and GTE have stated that they will directly compete against other local telephone service providers on a national scale. The result of this direct competition will be a variety of choices for local telephone services and

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new services at affordable prices. As the new company expands into new markets, small businesses will be an early and significant beneficiary from the competition.

- LONG DISTANCE SERVICES. The new company will be able to build upon GTE's current long distance network to become a major competitor in the long distance market. Again, this type of competition can only benefit small businesses in their choice of long distance services. The costs to small businesses for long distance and 800 number services can be a significant drain upon their revenues. Additional competition in this area will directly benefit small businesses through more services, more choices, and lower prices.
- ADVANCED TELECOMMUNICATIONS SERVICES. The new Bell Atlantic-GTE will be able to use its combined resources to become a "top-tier" provider of Internet services and expand their advanced telecommunications services infrastructure. Advanced telecommunications services are critical to small businesses as they expand their customer and marketing bases. The new company's ability to deliver these services on a national scale will allow small businesses throughout the nation to benefit from the advantages of using these advanced services to augment and expand their businesses. Further competition in this area will provide additional and needed benefits to our members.
- BUNDLED SERVICES. The new company has committed to provide a variety of current and new services to the telecommunications consumer. Small businesses look for choice and the ability to obtain services at affordable prices. This one-stop shopping concept of the new company will enable small businesses to use their dollars more effectively to purchase more services than they can today. It is important that competition for the small business market revolve around serving all aspects of small businesses' needs, not just the lowest price (though price is always crucial). This broadbased competition will be greatly encouraged by the merger.
- WIRELESS. As the nature of telecommunications evolves, the use of wireless services becomes even more essential for small businesses. We are encouraged by the new company's commitment to provide expanded and new wireless services on a national and international level. This will result in further competition in this critical area, which will enable small businesses to obtain wireless services at competitive prices.

We urge the commission to approve this merger. The merger presents tremendous opportunities for expanded competition that will benefit small business consumers directly and immediately. The new, vigorous competition that will result from this merger can finally take us in the direction that the Telecommunications Act of 1996 envisioned.

Sincerely,

Todd McCracken

President